

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Julie Dalton,

Court File No. _____

Plaintiff,

vs.

NOTICE OF REMOVAL

Royal Stars Liquidators, Inc.,

Defendant.

TO: THE CLERK OF THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA.

PLEASE TAKE NOTICE that, Pursuant to 28 U.S.C. §1441(a) and (c), and §1446(a) Defendant Royal Stars Liquidators, Inc. hereby demands removal of the case entitled *Julie Dalton vs. Royal Stars Liquidators, Inc.* from State of Minnesota District Court in Hennepin County to the United States District Court, District of Minnesota, based upon 28 U.S.C. §1331. Defendant Royal Stars Liquidators, Inc. states as follows:

1. That attached hereto and marked as Exhibit A is a true and correct copy of the Summons and Complaint in the Hennepin County action.
2. That, to the best of the undersigned's knowledge, the Summons and Complaint was provided to Defendant on or about February 7, 2022.
3. That attached hereto and marked Exhibit B is a true and correct copy of Defendant's Answer to Plaintiff's Complaint.
4. That the above documents constitute all process and pleadings to date.
5. That Plaintiff's Complaint alleges a claim under 42 U.S.C. 12181, et. seq. Thus Plaintiff has plead a federal claim making this case removable under 28 U.S.C. §1331.

6. That contemporaneously with the filing of this Notice, this Notice is being provided to all counsel of record pursuant to 28 U.S.C. § 1446(d). As this case has not yet been filed in Hennepin County District Court, no notice to the Court Administrator need be filed to halt proceedings.
7. It is respectfully submitted that removal of this action is proper and that this Court has jurisdiction to adjudicate the dispute between the parties.

WHEREFORE, Defendant Royal Stars Liquidators, Inc. respectfully requests that this cause proceed in the United States District Court, District of Minnesota, as an action properly removed.

Dated: 2/28/22

DUDLEY AND SMITH, P.A.

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